

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS AND ST. JOHN

PETER J. LYNCH,

Plaintiff,

v.

KATHRYN ANNE DONNELLY, in her Official Capacity as Virgin Islands Special Designated Disciplinary Counsel, and in her Individual Capacity, and TANISHA BAILEY-ROKA, in her Official Capacity as Virgin Islands Chief Disciplinary Counsel, and in her Individual Capacity,

Defendants.

Civil No. 3:24-cv-00043

**COMPLAINT FOR
INJUNCTIVE RELIEF
AND DAMAGES**

ATTORNEY KATHRYN ANNE DONNELLY'S AND ATTORNEY TANISHA BAILEY-ROKA'S JOINT MOTION TO STRIKE AND ALTERNATELY FOR A MORE DEFINITE STATEMENT AND TO QUASH SERVICE OF PROCESS

COME NOW, Kathryn Anne Donnelly and Tanisha Bailey-Roka, in their official and individual capacities, by and through the undersigned counsel, and hereby jointly move this Honorable Court to strike portions of the Verified Complaint filed herein and/or for the Court to

Peter J. Lynch v. Kathryn Anne Donnelly, et al.

Civil No. 3:24-cv-00043

Joint Motion to Strike and Alternately for a More Definite Statement and to Quash Service of Process

order the filing of a more definite statement, and quash service of process, pursuant to Rule 12(e) and (f) of the Federal Rules of Civil Procedure, and file their Memorandum of Law herewith.

DATED: October 8, 2024

RESPECTFULLY SUBMITTED,

By: /s/ Paul L. Gimenez

Paul L. Gimenez, Esq., Bar # 225

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Attorney for Defendants

By: /s/ H. Marc Tepper

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Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of October 2024, I caused a true and exact copy of the foregoing to be served through the Court's electronic filing system, via email upon the registered parties.

/s/ Paul L. Gimenez, Esq.